



JON S. CORZINE  
Governor

## New Jersey Office of the Attorney General

Division of Consumer Affairs  
State Board of Veterinary Medical Examiners  
124 Halsey Street, 6<sup>th</sup> Floor, Newark, NJ 07102



ZULIMA V. FARBER  
Attorney General

KIMBERLY S. RICKETTS  
Director

June 19, 2006

By Certified and Regular Mail

Florentino R. Romero, D.V.M.  
78 Townsend Street  
New Brunswick, New Jersey 08901

Florentino R. Romero, D.V.M.  
Merrick Boulevard Animal Hospital  
115-31 Merrick Boulevard  
Jamaica, New York 11434

Re: I/M/O FLORENTINO R. ROMERO, D.V.M.  
Alleged Unlicensed Practice of Veterinary  
Medicine in the State of New Jersey

Offer of Settlement In Lieu of Disciplinary Proceeding

Dear Dr. Romero:

This letter is to advise you that the New Jersey State Board of Veterinary Medical Examiners (hereinafter referred to as the "Board") has had an opportunity to review information it received which alleges that you, via the business named "Mama's & Papa's Pet Shop" located at 982 River Road, Edgewater, New Jersey 07020, are engaged in the unlicensed practice of veterinary medicine, contrary to the mandates of N.J.S.A. 45:16-9. The information reviewed by the Board indicates that you are offering and advertising to provide veterinary medical services, including "disease prevention, disease treatment, surgical operation," to the consuming public. The Board has concluded that, in your advertisement, you improperly utilized the initials of "D.V.M." and the title "veterinarian" in such a manner as to tend to convey the impression that you are authorized, via licensure, to practice veterinary medicine in this State when in fact you are not a licensed veterinarian in this State.

RECEIVED and FILED by the  
NEW JERSEY STATE BOARD OF  
VETERINARY MEDICAL EXAMINERS  
on this date of: 6-19-2006

Mailing Address:  
P.O. Box 45020  
Newark, NJ 07101  
(973) 504-6500

Specifically, the information reviewed by the Board included, but is not limited to, the following documents:

1. An advertisement/flyers which advertise that "Dr. Romero, our veterinarian" can perform "surgical operations, teeth scaling, disease prevention, disease treatment . . . for dogs and cats," as well as any and all attachments and exhibits.

A copy of the advertisements/flyers are attached for your convenience.

A review of the records maintained by the Board, which licenses veterinarians in the State of New Jersey, reveals that you have not been licensed as a veterinarian in this State. The Board's investigation into this matter further reveals that you are licensed as a veterinarian in the State of New York and may be owner of several businesses in New York, including other pet stores also entitled "Mama's & Papa's" in Flushing and Jamaica, New York.

Upon review of all available information, the Board has preliminarily found that probable cause exists to support a finding that you violated the mandates of N.J.S.A. 45:16-9. The information reviewed by the Board specifically indicates that you held yourself out in written documentation as a veterinarian and advertised in such a manner, by utilizing the terms "D.V.M." and the title "veterinarian," as to tend to convey the impression that you are authorized to practice veterinary medicine in this State. when in fact you are not a licensed veterinarian in New Jersey. A review of the Board's records reveal that you have not been granted a license by the Board to practice veterinary medicine in this State.

At this juncture, the Board has determined that the above information is sufficient to warrant the initiation of formal enforcement proceedings against you, in the Superior Court of New Jersey, for the violation of N.J.S.A. 45:16-9. Notwithstanding that determination, however, the Board has determined that it will resolve this matter, and thereby avoid the initiation of any formal proceedings, by issuing this settlement letter and request that you consent to voluntarily submit to the jurisdiction of the Board in this matter and to the following:

1. Cease and desist from holding yourself out as a licensed veterinarian in the State of New Jersey and improperly advertising in any written form or manner, via your use of the terms "D.V.M." and the title "veterinarian," to convey the impression that you are authorized to practice veterinary medicine in this State until and if you become licensed as a veterinarian in New Jersey by the Board;
2. Pay a penalty in the amount of **\$2,500.00**, to be paid immediately upon your signing of the acknowledgment at the bottom of this letter, for your violation of N.J.S.A. 45:16-9; and
3. Pay a portion of the investigation costs incurred by the Board in this matter in the amount of **\$2,838.09**, to be paid immediately upon your signing of the acknowledgment at the bottom of this letter.
4. In the alternative, the respondent shall agree that payment for the civil penalties and investigative costs shall be made by Dr. Romero in installment payments for the period of eighteen (18) months at the rate of \$296.56 per month commencing on July 15, 2006. These payments shall be made by certified check or money order made payable to the State of New Jersey. Additionally, the payments shall be due on or before the fifteenth (15) day of each month and shall be submitted to Leslie G. Aronson, Executive Director of the Board of Veterinary Medical Examiners at the address listed above. Any failure to make any installment payment when due shall cause the entire remaining balance to become immediately due and payable without further notice. Subsequent violations will subject respondent to enhanced penalties pursuant to N.J.S.A. 45:1-25.

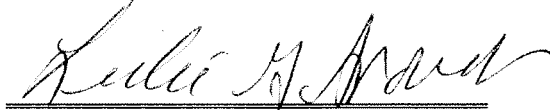
If you are willing to settle this matter on the offered settlement terms, you may do so by signing the acknowledgment at the bottom of this letter, and returning it to the Board office. On the expectation that you will heed the above directives of the Board and comply with the settlement terms detailed above, the

Board will consider this matter closed. In such event, this letter will be a matter of public record.

In the event, however, that you are unwilling to settle this matter on the offered terms or that no response is received from you within the state time period, it will be assumed that you have rejected the Board's settlement proposal and the settlement offer set forth herein will be withdrawn. Thereafter, this matter will be referred to the Attorney General's office for the initiation of a formal enforcement proceedings in the Superior Court of New Jersey. You are advised, however, that in the event formal charges are filed, the Board may request the Court to impose civil penalties in an amount greater than that offered herein the settlement proposal should any charges against you be sustained. Additionally, the Board may, if the facts are found to so warrant, request injunctive relief and for an Order requiring you to reimburse certain monies and/or requiring you to pay investigative costs and/or attorneys fees incurred by the Board. Should you have any questions concerning this letter, I suggest that you contact Deputy Attorney General Olga E. Bradford who may be reached at (973) 648-3696.


NEW JERSEY STATE BOARD OF  
VETERINARY MEDICAL EXAMINERS

By:

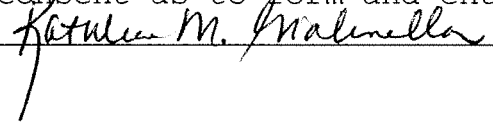


LESLIE G. ARONSON  
Executive Director

ACKNOWLEDGMENT: I, **FLORENTINO R. ROMERO, D.V.M. (Unlicensed in the State of New Jersey)**, hereby acknowledge that I have read and reviewed the settlement proposal set forth in the above letter. I acknowledge the conduct which has been charged. I am aware that, by signing this acknowledgment, I am submitting to the jurisdiction of the Board and waiving any rights I may have to defend myself against any charges of wrongdoing in the Superior Court of New Jersey at a hearing. I am also aware that the action taken against me by the Board herein is a matter of public record, and that this letter is a public document. I hereby agree to cease and desist from holding myself out as a licensed veterinarian in the State of New Jersey, pay a penalty in the amount of **\$2,500.00** and pay a portion of the Board's investigative costs in this matter totaling **\$2,838.09** which are to be paid upon signing of this acknowledgment.

  
\_\_\_\_\_  
FLORENTINO R. ROMERO, D.V.M.  
Unlicensed in the State of New Jersey

Consent as to form and entry:

  
\_\_\_\_\_  
KATHLEEN M. GIALANELLA, ESQUIRE  
Attorney for the Respondent

DATED: 8/9/06

cc: Deputy Attorney General Olga E. Bradford